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1.0 Equipment and Aisle Space Requirements:

1.1 Safety and Emergency Equipment Requirements and Inspections: 270.14(b)(4), 264.32, R-450 3.3.2(a)(4), 8.3.3

The inspection schedule for facility safety and emergency equipment is provided in Attachment 4, Appendix A. Inspection schedules for equipment specifically used for the management of waste in tanks, containers, and the incineration system will be included in Attachment 4; Appendices B, C, and D.

1.1.1 Internal Communications: 264.32(a), R-450 8.3.3(a)

Communications inside the CIF will be achieved through a telephone system, public address (PA) system, and two-way radios. Telephones will be located so that each employee will have immediate access to one from his work station. From each telephone an employee can call any other telephone in the CIF, can be connected to an outside phone line, and can access the PA system for paging. The telephone system will be equipped with an uninterruptible power supply for reliability during a loss of primary power. Two-way radios will be available at each waste management unit, to supervisors, and in some company vehicles to supplement the telephone system. The paging system will be

broadcast through a series of loudspeakers to provide coverage throughout the active portion of the facility.

The internal communication system will be tested a minimum of monthly. However, use of the internal communication system during the course of normal operations will be more frequent and indicate any developing problems.

Alarms will be broadcast over the paging system loudspeakers. Alarms will be triggered by dialing the appropriate code at any telephone, by tripping a manual pull-station, or by automatic alarm condition detectors such as fire detectors at a shredder. A fire alarm will cause a siren sound to be broadcast. A general emergency warning alarm will cause a warbling sound to be broadcast. A facility evacuation alarm will cause a distinctive alternating tone (whooping) to be broadcast. All facility alarms will be tested weekly.

1.1.2 External Communications: 264.32(b), R-450 8.3.3(b)

External facility communications will be available through the local telephone company. Local (Salt Lake City or Tooele City) or long-distance telephone connections will be available.

Incoming calls will be transferred to the telephones located throughout the facility as necessary.

The Main Office (Unit 052) will also have a Citizen's Band two-way radio to communicate with outside agencies.

1.1.3 Emergency Equipment: 264.32(c), R-450 8.3.3(c)

Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment will be available at the facility. Description and locations of emergency equipment for the facility are in the Contingency Plan (Attachment 7 of the permit). The Emergency Equipment List is located in Section 5 of the Contingency Plan.

1.1.4 Water for Fire Control: 264.32(d), R-450 8.3.3(d)

The facility will have fire water available for fire fighting. Water for fire fighting will be stored in a reservoir and distributed through a pipe network.

Buildings classified according to the Uniform Building Code as an Ordinary Hazard Group III, such as the Container Management Unit

(101); or Extra Hazard Group I, such as the Organic Sludge Decanting and Repackaging Unit (102) will be equipped with a fire protection system meeting the requirements of NFPA 30. Each of these systems has been designed to minimize the possibility of a fire, isolate and confine the spread of a fire, and limit the area of exposure to a fire. These systems would consist of a water and foam sprinkler system installed in the building with a maximum sprinkler head spacing of 100 square feet per head.

The fire water flow required by NFPA 30, Table D-4-6.2.1, is based on 0.3 gallons per minute per square foot over an area of 2,550 square feet plus a hose stream flow of 500 gallons per minute. This flow rate is 1265 gallons per minute. NFPA 30 requires that this minimum flow rate be sustainable for two (2) hours and that the volume expended be replenished within eight (8) hours. The volume required for the fire water supply is thus 151,800 gallons.

The water storage tank provided at the CIF (Unit 031 on Drawing 43-01-1-011) has a capacity greater than 685,000 gallons. This volume allows for an adequate fire water reserve.

The two (2) fire pumps will be specified to meet NFPA 20 requirements. Both pumps will have an internal combustion engine drive. Each of the fire water pumps will be rated to supply adequate volumes at a high enough pressure to operate foam systems.

A description of the fire fighting equipment at the CIF is included in Section 5 of the Contingency Plan (Attachment 7 of the permit).

1.2 Aisle Space Requirement: 264.35, R-450 8.3.6

A system of interior facility roads, illustrated on drawing 43-02-1-002, will be available for moving and positioning emergency response vehicles. Building interiors, containment system, and waste handling areas will also have access aisles to move and position hand held and portable emergency response equipment. Adequate aisle space will be maintained to allow unobstructed movement of personnel, fire protection equipment, or spill control equipment to any area of the facility. A minimum aisle space of two and one-half (2 1/2) feet will be maintained at the CIF.

2.0 Preventive Procedures, Structures, and Equipment:

Various procedures, structures, and equipment have been incorporated into the design and operating procedures of the facility to minimize hazards to human health and the environment. Examples of procedures, structures and equipment utilized to prevent hazards will include:

- An engineering description of the Container Management Building is provided in Attachment 9 of this permit.
- An engineering description of the storage and treatment tanks at the CIF is provided in Attachment 11 of this permit.
- A list of emergency equipment and a description of the emergency procedures are provided in the Contingency Plan (Attachment 7 of this permit). The Contingency Plan will be available at the facility at all times.
- Special precautions will be taken to prevent accidental ignition or reaction of ignitable wastes or the mixing or incompatible wastes (refer to 3.0 of this section).

- Forklifts and hand trucks will aid in safe transport of cargo.
- Applicable procedures provided in American Petroleum Institute Publication 2009, Safe Practices in Gas and Electric Cutting and Welding in Refineries, Gasoline Plants, Cycling Plants, and Petrochemical Plants, Fourth Edition, March 1982, will be observed during repairs performed near ignitable materials.
- A list of emergency equipment and a description of the emergency procedures are provided in the Contingency Plan (Attachment 7, Section 5 of this permit). The Contingency Plan will be available at the facility at all times.

2.1 Unloading Operations: 270.14(b)(8)(i), R-450 3.3.2(a)(8)(i)

Various procedures, structures, and equipment have been incorporated into the loading and unloading operations to prevent environmental and health hazards; including:

- Facility operations personnel will receive training on proper unloading and loading procedures. This training will include instruction on machinery operation, safety equipment, waste identification, and processing procedures. Employees will be given the training required by OSHA for operators of industrial trucks (powered and non-powered) and dock equipment during the Job-specific Orientation part of Introductory Training and/or the Unloading and Loading Trucks Class in the Operations Group of the Continuing Education Program. Employees will be required to comply with OSHA regulations regarding operations, such as the restrictions on the number of riders allowed on a powered industrial truck, the placement of wheel chocks for trailers before the trailer is entered, etc. Details of the personnel training plan are provided in Attachment 5 of this permit.

- All waste loading, unloading, storage and treatment will be performed within containment areas. The containment areas will be constructed of concrete and consist of a floor slab with either curbs or walls. The concrete surface of the containment will be coated

with a sealant and sloped to sumps to allow accumulation and removal of leaks or spills.

- Any metal bulk liquid container of ignitable material will be grounded by means of a heavy clamp and cable before loading or unloading. Prior to loading or unloading a bulk liquid container, the operator will visually check that valves are in the correct position (either open or closed depending on the valve function), hoses are secure, and any needed hose connection plugs and caps are in place. Immediately following the loading or unloading a bulk liquid container, the operator will visually check that valves are in the correct position and any needed hose connection plugs and caps are in place.

- Bulk solid and sludge containers will arrive by truck or rail transport. The containers will include sludge boxes, intermodal containers, end-dump trucks, and railroad gondolas. Bulk solids in railroad gondolas will be unloaded using a backhoe or trackhoe in the Bulk Materials Building. The trackhoe will be supported on a platform above the gondolas and the

material removed from the railcar will be placed in storage tanks. Bulk solid and sludge material transported by tilt-bed trucks will be emptied into storage tanks in the Bulk Materials Building. Two operators will be present during unloading and will:

- Stand away from the rear of the container;
 - Be aware of all personnel in the immediate area;
 - Not enter a tilted container to dislodge trapped material;
 - Never move the transport truck with a tilted container; and
 - Never walk behind a tilted container to inspect the contents.
-
- Containers will be unloaded from and occasionally loaded into truck trailers at the Container Management Building. These truck trailers will be loaded or unloaded using an industrial truck or hand truck. Containers will typically be fifty-five (55) gallon drums, although larger and smaller containers will also be loaded and unloaded. Regardless of the size, some

of the containers will be palletized (i.e. loaded or packaged on a pallet) prior to arriving at the CIF. Palletized containers will typically be secured to adjacent containers on the same pallet by straps, tape, or "plastic" wrapping.

The industrial trucks will be capable of securely lifting and transporting both palletized and non-palletized containers. Fork attachments for the industrial trucks will be used for lifting and transporting palletized containers. Drum-grasping (i.e. pincher) or fork attachments for the industrial trucks will be used for lifting and transporting individual non-palletized containers. These drum-grasping attachments are capable of securely holding a container during lifting and transporting without requiring additional straps or hooks. Operators will ensure that the containers are secure prior to lifting and transporting and that the industrial truck attachments are appropriate for the container(s) to be moved. The operators will also be responsible for ensuring that the truck trailer and the dock or ramp are properly aligned prior to any loading or unloading activities.

Hand trucks will be used for moving individual containers (typically drums). The hand trucks will have forks or a plate which can be slid beneath the bottom of an individual container to support the container during lifting and transporting. The hand trucks will either have a clip to secure the top of the container, or be shaped in an arc to cradle the container during lifting and transport. These hand trucks have features capable of securely holding a container during lifting and transporting without requiring additional straps.

2.2 Run-off: 270.14(b)(8)(ii), R-450 3.3.2(a)(8)(ii)

The facility will have containment systems to prevent migration of surface and subsurface liquids from waste handling areas to other areas of the facility, or to the environment. This liquid could be precipitation from storm events; or spills and leaks of hazardous waste. The surface of the containment systems will be coated with a sealant and sloped toward one or more sumps to allow collection and removal of any accumulated liquids. The accumulated liquid will be sampled, analyzed, and handled in accordance with the Waste Analysis Plan (Attachment 2 of this

permit). Containment systems not protected from precipitation by a building have been designed to accommodate the precipitation from a twenty-five (25) year, twenty-four (24) hour storm event (1.9 inches). Examples of containment systems which are not protected from precipitation by a building include Waste Fuel Tank Farm A and Waste Fuel Tank Farm B. Examples of containment systems which are protected from precipitation include the Solids Storage Tanks and Energetic Solids Storage Tanks. A description of the materials of construction and drawings showing the design and dimensions of containment systems and sumps are provided in Attachment 12 of this permit. Storm water from precipitation falling outside of the containment areas described above will be controlled to prevent run-on of the storm water into a waste management unit. This will be performed by a storm water diversion and collection system which is illustrated on the preliminary grading plan for the facility (refer to drawings 43-01-1-J04 & -J05).

All spills of hazardous waste will be promptly controlled and removed to prevent spread of contaminants. Examples of spill response procedures are provided in the Contingency Plan (Attachment 7 of this permit). The spilled material and any absorbent used will be placed into appropriate containers. The

contents of the containers will be sampled, analyzed, and handled in accordance with the Waste Analysis Plan (Attachment 2 of this permit).

2.3 Water Supplies: 270.14(b)(8)(iii), R-450 3.3.2(a)(8)(iii)

Operation of the CIF will require two (2) types of water: (1) potable water, and (2) plant water. Potable water will be used for personnel decontamination, eye-wash stations, and safety showers. Plant water will be used for equipment decontamination, fire fighting, boiler feed etc. The plant water will be stored in the Treated Water Storage Tank (unit identification number 031). The Treated Water Storage Tank location is illustrated on drawing 43-03-3-001. The plant water will be obtained from an off-site sub-surface water well(s).

Potable and plant water will be distributed throughout the facility by separate water delivery systems. Backflow preventers will be used to prevent contamination of the water in a delivery system by hazardous waste. An example of the application of a backflow preventer is provided on drawing 43-60-9-J03.

2.4 Equipment and Power Failure: 270.14(b)(8)(iv), R-450
3.3.2(a)(8)(iv)

There are no critical units at the CIF for which electric power is required in an emergency.

The equipment used to manage hazardous waste at the CIF will generally be powered with electric motors. Some critical equipment will be powered by internal combustion (IC) engines as backups. The important non-motor electrical systems will be equipped with uninterruptible power supplies (UPS), which are special battery backup devices.

Each UPS will have the capacity to provide electricity to the system it serves for approximately two hours. An individual UPS will be provided for the process instrumentation system at the Incinerator, the instrumentation system at the Tank Farms, for the plant communication, alarm, and secondary gate sensors systems, for emergency lighting, and for the main substation switchgear.

The two kiln drives, both of the fire water pumps, and one process water pump will be equipped with IC engines.

Normally, the electrical requirements of the CIF will be met with power purchased from Utah Power & Light (UP&L).

Should a momentary "blink" in the UP&L service occur, the UPS's would allow the controls to continue to operate.

Should a total electrical outage occur, operations will implement power outage procedures to recover electrical equipment in a controlled fashion and to minimize the probability of opening the thermal vent. In the event that air pressure is lost, pressurized controllers fail to their safe (generally closed) position. The data acquisition and recording devices would continue to operate with power supplied by the UPS's. If the outage involved the UPS's, then the data collection and recording functions would be lost, but there would be no effect on the systems controlled.

The IC engines for the kiln drives and the water systems would be started.

Since all hazardous waste management systems are contained, there would not be any releases as a result of a power failure, except those associated with the thermal vent. There are no processes

involving high pressures or reactions which might "run away" and cause fires, explosions, or other sudden releases of hazardous waste.

No hazardous waste management units are critical. The fire water system is critical, but it is provided with backup IC engine drives.

Therefore, the emergency power systems at the CIF are adequate to supply necessary power to critical units.

**2.5 Personnel Protection Equipment: 270.14(b)(8)(v), R-450
3.3.2(a)(8)(v)**

Personnel protection equipment available at the facility will include the following:

- Self-contained breathing apparatus (SBA). A number of devices consisting of a portable cylinder of compressed breathing air, pressure regulator, hose, full-face mask, and carrying harness will be available. Personnel can use the SCBA's to enter an area where smoke or gases make the ambient atmosphere dangerous to

breathe. Each SCBA can supply approximately one-half hour of air. The SCBA's will be available at the safety equipment storage area. A description of the safety equipment storage area is provided in the Contingency Plan (Attachment 7 of this permit).

- Supplied-air breathing system (SABS). Special compressors will produce breathing air through a pipe manifold and hose system. The hoses will connect to the worker's hood/facemask unit. The worker's coverall will be made of a chemical resistant synthetic fabric.
- Cartridge air mask. There are two types of cartridge masks, full face and half face. They are both equipped with fittings to which contaminant-specific cartridges are attached. Air to be inhaled by the wearer is filtered through the cartridge and the specific contaminants are removed. Each employee will be issued a mask and cartridges appropriate for his work area. Cartridges for other contaminants and both styles of masks will be stocked at each waste management unit and the safety equipment storage area. A description of

the safety equipment storage area is provided in the Contingency Plan (Attachment 7 of this permit).

- o Protective clothing. Employees working in the CIF will be issued hard hats, protective coveralls, waterproof safety boots, specialized gloves, and hearing protection on a routine basis. The hard hats are made of high impact plastic. The coveralls are made from polyethylene fibers (such as Tyvek) and are disposable. The boots are solvent resistant synthetic rubber. The gloves are latex rubber, synthetic rubber, or knit (cotton, polyester, etc.) depending upon the specific job requirements. A supply of the appropriate protective clothing will be maintained at each waste management unit and at the Safety Equipment Storage Area.

Minimum personnel protection equipment for all people within the CIF (i.e.; employees and visitors) will be a hard hat, and eye protection. This minimum protection level will not apply to personnel within passenger vehicles, the administration building, control rooms, or any other office space within the facility in which the risk of a head or eye injury does not exceed normal office work risks. Personnel protection equipment for employees

performing tasks within the waste management units may exceed this minimum protection level. Examples of personnel protection equipment required for personnel within specific waste management units includes the following:

- Container Management Building. Personnel performing sampling of containers in the Container Management Building (Unit 101) or engaged in decanting at the Decant Station (Unit 102) will be required to use supplied air or self-contained breathing apparatus unless and until exposure data indicates that an acceptable level of respiratory protection is provided by a cartridge type respirator. If a determination is made to require only a cartridge type respirator while sampling or decanting, before implementation, notice of this determination shall be provided in writing to the Executive Secretary and the justification for the determination shall be placed in the operating record.
- Incineration System. Personnel working within the control rooms of the incineration system will be required to wear only minimum personnel protective clothing as described above when leaving the control

room. Within the control rooms, hard hats and safety glasses will not be required.

- Liquid Storage Tanks. Personnel working within the secondary containment areas for hazardous waste liquid storage tanks will be required to wear steel-toed foot protection in addition to the minimum personnel protection equipment as described. When sampling the contents of a tank, unloading trucks or making hose connections, personnel protection equipment required will include cartridge type respirators, chemically resistant coveralls and gloves, in addition to the minimum protection level described above.
- Solid/Energetic-Solid Storage Tanks. Personnel protective equipment for personnel performing tasks in the solid storage tanks area will be cartridge type respirator, chemically resistant coveralls, gloves and protective footwear, in addition to the minimum protection level described above.
- Laboratory. Personnel working within the laboratory will be required to wear safety glasses. Laboratory

personnel will wear additional protective equipment under some situations (e.g. waste sampling). Personnel protection equipment for waste sampling will include chemically resistant coveralls and gloves in addition to the minimum protection level. Experiments and tests which may produce gases or vapors will be conducted under a ventilation hood within the laboratory.

Personnel at the CIF will be responsible for decontaminating their own personnel protection equipment. Cartridge type respirators will be washed daily with soap and water at the end of the individuals work shift. The chemically resistant coveralls and gloves are disposable and will be discarded as necessary and at least daily. Employees will be trained in the proper decontamination of personal protective equipment during their Introductory Training. This training will include:

- Hands on demonstration on hard hat and respirator decontamination.
- Discussions of appropriate disposal methods for contaminated coveralls and gloves.
- Instructions in washing rubber gloves and boots.

3.0 Ignitable or Reactive Waste:

3.1 Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Waste and Mixing of Incompatible Wastes: 270.14(b)(9), 264.17(a), R-450 3.3.2(a)(9), 8.2.8(a)

Precautions will be taken at the facility during storage, treatment, transportation, and handling to prevent the accidental ignition or reaction of waste and mixing of incompatible wastes. These precautions are intended to prevent unwanted heat, pressure, fire, explosion, toxic gases or fumes which could result in damage to the structural integrity of any portion of the facility or cause a threat to human health or the environment. The precautions will include:

- Ignitable waste will be protected from open ignition sources such as open flames, metal welding and cutting, hot surfaces, frictional heat, smoking, and sparks (static, electrical or mechanical). Permanent storage tanks will be grounded to protect the contents from ignition from a spark. Bulk liquid containers (tank trailers, railroad tanks and transport tanks) of ignitable material will also be grounded with a cable and clamp between the container and the ground prior to

loading or unloading. Electrical equipment in Class I Hazardous Areas (where ignitable mixtures of gasses or vapors are or might be present) will be specified for the application in accordance with Occupational Safety and Health Administration regulations. Drawings 43-53-6-001, 43-25-6-001, 43-10-6-001, 43-10-6-002, 43-10-6-003, 43-53-6-002, 43-53-6-003, and 43-99-6-001 illustrate the locations of Class I Hazardous Areas within the CIF. Signs prohibiting smoking will be conspicuously placed within and near the Class I Hazardous Areas. Applicable procedures provided in API Publication 2009, Safe Practices in Gas and Electric Cutting and Welding in refineries, Gasoline Plants, Cycling Plants, and Petrochemical Plants, Fourth Edition, March 1982, will be observed during repairs performed near ignitable materials.

- Ignitable and reactive waste will be protected from spontaneous ignition from heat producing chemical reactions by segregating incompatible waste streams. If a liquid is not compatible with the contents of one of the storage tanks, the liquid may be fed directly to the incineration system from its original container at

the Special Handling Bay (Unit 538). The Special Handling Bay will accept liquid wastes from trucks only. The Special Handling Bay will accept gaseous wastes from trucks or from portable cylinders. The Special Handling Bay is isolated from any uncontrolled sources of ignition and its location is illustrated on drawing 43-01-1-J02. The liquids will be transferred under pressure through dedicated pipes with flow cutoff devices (See drawings 43-53-9-J03 & 43-99-9-A02). The Special Handling Bay will have a floor constructed of concrete to provide containment for leaks or spills from the container. The pipes will be purged with an appropriate fluid between batches. The liquid pipes will be purged with fuel oil or water. The gas pipes will be purged with nitrogen.

- Buildings which enclose waste handling operations will be ventilated to prevent an accumulation of toxic mists, fumes, dusts, or gases; or flammable fumes or gases.

- o The determination of incompatibility will be in accordance with the procedures outlined in the Waste Analysis Plan (Attachment 2 of this permit).

**3.2 Management of Ignitable or Reactive Wastes in Containers:
270.15(c), 264.176, R-450 3.3.2(b)(1)(iii), 8.9.7**

Ignitable or reactive wastes in containers may be either solid, sludge or liquid. Management of ignitable or reactive wastes in containers will include the following guidelines:

- Large containers of ignitable and reactive solid or sludge waste will be unloaded at the Bulk Materials Building or Unit 106. Small containers of ignitable and reactive solid, sludge or liquid will be unloaded at the Container Management Building. Both buildings and Unit 106 are located in excess of fifty (50) feet from the facility boundary. Drawing 43-01-110 illustrates the buffer between the buildings/Unit 106 and the facility property line.
- The Container Management Building is composed of six (6) storage rooms; all similar in design and construction. Interior and exterior walls meet the UL four (4) hour fire rating. Equipment and personnel access doors are also four (4) hour fire rated. Equipment doors are provided with fusible links and

will automatically close in the event of fire. The building has been designed to comply with the Uniform Building Code and the appropriate sections of the National Fire Protection Association Code. The ventilation system for the CMB will provide four (4) air changes per hour, per OSHA recommendations. This ventilation will be accomplished through strategically located axial air ventilators and wall mounted intake louvers. Because containers will be kept closed except for inspection and sampling, VOC emissions will be minimal.

- Shredding and repackaging of small containers is an enclosed operation, with a vacuum/pressure relief valve venting to a carbon absorption system. Attachment 12 of this permit provides an engineering description of the container shredding and repackaging operation.
- Ignitable liquid wastes in containers will normally be transferred to a storage tank for blending prior to incineration. Section 3.4 in Attachment 6 provides information on the management of ignitable and reactive wastes in tanks.

**3.3 Management of Incompatible Wastes in Containers: 270.15(d),
264.177, R-450 3.3.2(b)(1)(iv), 8.9.8**

Management of incompatible wastes in containers will include the following precautions:

- Incompatibility between two wastes or a waste and a container will be determined from published scientific or engineering literature, laboratory tests, or previous experience, in accordance with the Waste Analysis Plan (Attachment 2 of this permit).
- Containers of waste received within one truck trailer will be assumed to contain compatible waste as required by the U.S. Department of Transportation regulations. These containers will be unloaded into a common containment area in the Container Management Building for incoming load analysis in accordance with the Waste Analysis Plan (refer to Attachment 2 of this permit). If subsequent identification of the waste during the incoming load analysis reveals the existence of incompatible wastes in a common containment area, the container holding the incompatible waste will be re-

moved and placed in an appropriate containment area. Attachment 9 of this permit provides a description of the Container Management Building and container management procedures.

- Incompatible wastes will not be placed in the same container. Wastes added to containers must be compatible with the contents of the container and the container itself.
- The Thaw Unit (105), Special Handling Bay (538), and Rail/Truck Transfer Bay (535) are located at least 50 feet from the facility boundary.

**3.4 Management of Ignitable or Reactive Wastes in Tanks:
270.16(j), 264.198, R-450 3.3.2(b)(2), 8.10**

Ignitable or reactive wastes placed in tanks for treatment or storage may be either solid, sludge or liquid. Management of ignitable or reactive wastes in tanks will include the following guidelines:

- Liquid wastes which exhibit the characteristics of corrosivity or reactivity as defined by 40 CFR 261.32 will not be placed in tanks for storage at the CIF.
- Ignitable liquid wastes will normally be transferred to one of the waste fuel storage tanks for blending prior to incineration. The waste fuel storage tanks are a fixed-roof type. A nonflammable blanket of nitrogen gas will be maintained in the vapor head space of the tank. Each tank will have a pressure and vacuum relief valve to allow the nitrogen to be vented to the incineration system during tank filling and breathing. The tanks will also have a rupture disk to protect the tanks from damage due to exceeding the design internal pressure.
- Ignitable solid or sludge waste will be placed in the energetic solids storage tanks in the bulk materials processing area. The air emissions from these storage tanks will be managed by one of two methods:
 - Under normal conditions the exhaust air will be used as combustion air in the secondary combustion

chamber (SCC) of the incinerator, thus destroying any Volatile Organic Compounds (VOC's); or

- During periods when the SCC is not in operation, the volume of air being exhausted from the tanks will be reduced by placing hooded lids over each tank. Only the vapor head space remaining for the tank after the hood has been placed will be ventilated. The hooded lids are further described in Attachment 11 of this permit. This minimum volume of exhaust air will be treated for VOC removal in a carbon adsorption system prior to exhaust to the atmosphere.
- Attachment 11, Tank Systems, provides a list of setback distances from the storage and treatment tanks to surrounding structures. All storage areas are located more than fifty feet from the property line and uncontrolled sources of ignition.

3.5 Management of Incompatible Wastes in Tanks: 270.16(j), 264.199, R-450 3.3.2(b)(2), 8.10

Management of incompatible wastes in tanks will include the following precautions:

- Incompatibility between two wastes or a waste and the construction materials of a tank will be determined from published scientific or engineering literature, laboratory tests, or previous experience, in accordance with the Waste Analysis Plan (Attachment 2 of this permit).
- Tanks containing wastes which are incompatible with other waste in other tanks will not share a common secondary containment system. Only compatible wastes will be stored in a common containment area. Incompatibility between two or more wastes will be determined in accordance with the Waste Analysis Plan (Attachment 2 of this permit).
- Incompatible wastes will not be placed in the same tank. Wastes added to tanks must be compatible with the contents of the tank. If a waste is not compatible with the contents of a tanks, the waste will be placed

in another tank or an empty tank. If waste is added to a contaminated, empty tank, the waste must be compatible with the previous contents of the tank.